IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS McALLEN DIVISION

UNITED STATES OF AMERICA

v.
S
Criminal No. M-19-CR-522
S

RICARDO QUINTANILLA, et. al.

UNOPPOSED MOTION FOR STATUS HEARING

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States of America, by and through the United States Attorney for the Southern District of Texas and the Chief of the Public Integrity Section of the Criminal Division of the Department of Justice and files this its Unopposed Motion for a Status Hearing:

I.

On January 23, 2020, the Court ordered that jury selection be set in this matter for July 7, 2020 for Defendants, Ricardo Quintanilla, Arturo C. Cuellar, and Daniel J. Garcia.

After the Court's order, the COVID-19 pandemic struck the United States. Despite, the pandemic, the parties have continued to make preparations to proceed to trial in this matter as scheduled for July 7, 2020. However, the parties are also keenly aware of the limitations that the pandemic has placed upon judicial proceedings.

As a complex matter, this case will likely involve a significant amount of exhibits. In order to properly prepare for trial, the parties would respectfully request a status hearing to inquire regarding the Court's anticipated trial structure or proceedings, if any, in the event that the pandemic continues into June. The parties further request the opportunity to have the hearing in order to address anticipated travel reservations for counsel and witnesses that do not reside in the area.

The Government has consulted with counsel for Defendants, who also do not anticipate

filing motions for continuance and have also expressed concern regarding the issues previously discussed.

WHEREFORE, PREMISES CONSIDERED, the Government moves the Court to set a status hearing in this matter to address said issues.

Respectfully submitted,

RYAN K. PATRICK United States Attorney

/s/ Roberto Lopez, Jr.
Roberto Lopez, Jr.

Assistant United States Attorney State Bar No. 24074617

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/s/ Peter M. Nothstein
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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of May 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will, in turn, send notification of said filing to all counsel of record through the CM/ECF System.

/s/ Roberto Lopez, Jr.
Roberto Lopez, Jr., AUSA

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with counsel for Defendants and they are unopposed to this Motion.

/s/ Roberto Lopez, Jr.
ROBERTO LOPEZ, JR.